

Message

From: Peter Thomas [pthomas@manuregy.com]
Sent: 8/21/2017 12:48:14 AM
To: Gordon, Michael [Gordon.Mike@epa.gov]
Subject: Steam activation
Attachments: EPA ruling re Section 119.docx

Mike,

As you are aware, steam activation has no bearing on the fact that our oxygen-starved gasification system falls under Section 112 rather than Section 126. For applications that require the micronutrients to be more tightly bound, we have recently found that steam activation will rarely if ever be required. We can simply raise the temperature several hundred degrees within the reaction zone, rather than steam activating the carbon. For other applications (e.g. crop production and feed additives), the micronutrients need to be bio-available, and we will neither raise the temperature nor use steam activation.

We have found that some regulators don't understand these subtleties, and they look for extremely minor and inconsequential differences between our operating conditions in an effort to significantly delay making a decision. This has not yet happened in Region 3, but we would sincerely appreciate it if you would remove the word "steam" in two places, change the wording in paragraph 2 to what is shown in the attached copy, and send a revised copy on EPA letterhead. A clean electronic copy should be adequate.

Please do not hesitate to call if you have any questions.

Regards,

Peter Thomas
Coaltec Energy USA, Inc.
434-989-1417 (Cell)
www.coaltecenergy.com

From: Gordon, Michael [mailto:Gordon.Mike@epa.gov]
Sent: Friday, August 18, 2017 9:36 AM
To: Peter Thomas <pthomas@manuregy.com>
Subject: RE: Hard copies?

Hi Peter,

Attached is a .pdf of the signed letter.

Mike Gordon
Environmental Engineer
Office of Permits and State Programs
Air Protection Division
EPA Region III
1650 Arch Street
Philadelphia, PA 19103
(215)-814-2039
Gordon.Mike@epa.gov

From: Peter Thomas [<mailto:pthomas@manuregy.com>]

Sent: Thursday, August 17, 2017 8:14 PM

To: Gordon, Michael <Gordon.Mike@epa.gov>

Subject: Hard copies?

Mike,

Have you mailed hard copies of your letter ruling regarding our gasification system?

Regards,

Peter Thomas

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